

REMARKS

Claims 6, 7, 9-11 and 13-18 are pending. Claims 7, 10, 11 and 13 have been amended, and new claims 19 - 21 have been added. In the amended claim set, the limitation of claim 6 (now canceled) has been incorporated into independent claims 10 and 11. Basis for the new claims is found at specification page 4, line 26-page 5, line 7, page 5, line 27- page 6, line 22, page 7, lines 21-25, page 16, lines 8-31, page 17, lines 6-7, and 17-19, page 18, lines 6-30, page 22, lines 5-7, the abstract, and figures 3 - 7. Entry of the amendments and reconsideration of the application are requested.

All of the amended claims require a cage in combination with the filter in the collapsible container that is part of the liquid supply assembly of claims 10 and 20 and the combination of claim 11 that includes a spray gun. Therefore, these remarks will address the remaining rejection that was applied to claims having a cage in combination with a filter. In the final rejection dated October 15, 2009 and the Advisory Action dated December 22, 2009, the claims having a cage within their scope (former claims 6, 7 and 9) were rejected as obvious over Joseph WO 02/08533 A1 and Joseph WO 98/32539 in view of Williams U.S. Patent 5,061,303, combined with Leliaert U.S. Patent 3,853,509. This rejection is traversed as to claims 7, 9-11, and 13-18 and is avoided as to new claims 19 - 21.

The final rejection (page 6) admits that the combination of Joseph WO02 and Joseph WO98 lacks a cage surrounding the filter within the container which cage is sufficiently flexible to allow the filter to collapse along its whole length if the container containing it collapses. Williams was cited to provide a disclosure of a filter with a cage. However, Williams fails to disclose important features of the amended and new claims.

Williams' cage is not sufficiently flexible to allow his filter 25 to collapse along its whole length if the container containing it collapses. Williams' filter units are designed for use in a dust collector, an apparatus used to filter dust from a gas stream, and one function of his design is to prevent collapse of the filter bag (column 5, lines 8-15). Although, the upper portion of his filter unit is designed to distort under a squeezing force exerted by a worker (removing or installing the unit) as taught in Williams column 5, lines 53-62, column 6, lines 11-37 and Fig. 4, Williams' filter unit will not collapse along its whole length during use. Its structure would not permit such collapse. His filter unit has a plurality of longitudinal supports (metal rods 48 combined with

retainer ring 50) to maintain the filter bag in a tubular configuration (column 4, line 65-column 6, line 5). The upper end of Williams' filter unit has biasing means (combination of collar portion 42, snap band spring 46, rods 48 and garter spring 54) allowing the upper end to be squeezed down during removal or installation, but Williams' cage structure will not collapse along its whole length because the part below garter spring 54 comprises the combination of rods 48 welded to retainer ring or rings 50 (column 5, lines 8-34). Williams Fig. 4 only shows the top part of his filter unit collapsing, not the whole unit. It does not support the assertion made in the office action and advisory action.

A skilled person would not contemplate the collapse of Williams' cage as a container containing it collapsed because the container in which his filters and cages are located (dirty air chamber 14 in his Fig. 1) is part of a dust collector that does not collapse in use; whereas, the container of claim 6 is intended to collapse as liquid (e.g., paint) is withdrawn from it. The inventive combination of a collapsible container with a collapsible filter inside is unique to the present invention, i.e., both collapse as liquid leaves the container through a spray gun.

Claims 10 and 11 require a cage surrounding the tubular body of the filter; whereas, Williams' cage structure 40 is inside his filter bag 38 (Fig. 2 and column 5, lines 8-15) and does not surround the filter. Office action page 7, lines 11-12 says, "...Williams teaches a cage 40 that surrounds the interior surface of the filter 24...." To take a position that the word "surrounds" in the context of claim 6 means surrounding the interior of a filter, when claim 6 says that the cage surrounds the tubular body of the filter, is clearly untenable. Williams' filter bag surrounds his cage.

Leliaert column 3, lines 36-45 was used in the final rejection to support a contention that it is well known to provide a cage on the outside of a filter. Like Williams, Leliaert is a teaching related to filters for filtration of gases, such as dust collectors (Leliaert column 1, lines 3-19, Figs 1 and 1a). Leliaert was cited for one part (outer cage 62) while ignoring the rest of his teaching. Leliaert as a whole should be considered, including parts that are contrary to the assertion of obviousness. Leliaert does not just teach a filter with an outer cage. He teaches a filter bag 40 disposed between an outer cage 62 and an inner cage 60 in a star design (column 3, line 57-column 4, line 18 and Figs 3-5). The star design of the cage allows closer spacing of filter tubes in a filtration apparatus than conventional cylindrical tubes (column 3, lines 51-67). Leliaert's filter

tube structures are not collapsible. With reference to his Fig. 3, Leliaert's outer cage is not collapsible, since it is secured by longitudinally spaced star ring member wires 78 (column 4, lines 51-56). Its collapse would be greatly hindered by the inner cage which is held in place by rigid cross wires 70 (column 4, lines 30-34). Even though Leliaert has an outer cage around his filter bag, he brings one no closer to the present claims than Williams.

Claim 15 and new claim 20 are further removed from the disclosures of the cited references in that they add requirements (respectively) for the filter body being oriented at an angle not parallel to the container side wall and for both filler opening and spray gun connection opening being offset from the container axis. None of the references teaches a filter at an angle to a container or located in a filler opening at an offset orientation (which places the filter at an offset angle to the container). As explained in the specification at page 7, lines 21-25 and page 14, lines 12-19 this allows liquid to be added to the container (and filtered) without disconnecting the liquid supply assembly from the spray gun.

New claim 21 claims a liquid supply assembly in which the filter has a cage that is integral with the filter mesh body (specification page 6, lines 21-22 and page 18, lines 6-11). This represents a greater difference over the cited combination of references than amended claim 10, since none of the references discloses a cage that is integral with the mesh material of the tubular filter. Likewise, none of the references discloses an annular support hoop integral with the filter body as claimed in new claim 19 (specification page 6, lines 8-9).

In order to arrive at the amended claims from the cited patents and publications, one would have to modify the cited art by:

- changing William's and/or Leliaert's cage to be collapsible along the entire length of the cage, despite structures in both patents that would prevent such collapse;
- changing William's cage to be one surrounding the filter instead of inside a filter bag;
- changing Leliaert's structure by eliminating structural features making it difficult to collapse the outer cage such as inner cage 60, cross wires 70 and the star design shape;
- adding the features of claims 15 and 20 (filter body oriented at an angle to the container side wall), despite the absence of any teaching to do so in the cited references;
- making a filter and cage combination in which the cage is integral with the cage as required in new claim 21

- making a filter with a cage and a support hoop integral with the filter body as in claim 19.

These modifications are too great to be obvious from the teachings of the combined references.

Hindsight, with the advantage of knowing the present invention, would be needed in order to make them.

In view of the above, claims 7, 9-11 and 13-21, as amended, are in condition for allowance. Withdrawal of the rejections under 35 U.S.C. §103(a) and a notification of allowability are requested. If any questions or issues remain, the resolution of which the examiner feels may be advanced by an interview, she is invited to contact applicant's attorney at the telephone number noted below.

Respectfully submitted,

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